

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

JASON BAKER, JOHN BREWSTER, JOANN BREWSTER,  
MAXINE CONDON, KAREN FARRELL, BROOKS LIDDIARD,  
JANET LIDDIARD, JAMES MCDERMOTT, HEIDI MCDERMOTT,  
PAUL MOREY, DONETTA MOREY, JOE TODD, BONNIE TODD,  
TOM WHIPPLE and PAULINE WHIPPLE,

Plaintiffs,

v.

ANSCHUTZ EXPLORATION CORPORATION, CONRAD  
GEOSCIENCE CORPORATION, PATHFINDER ENERGY  
SERVICES, INC. and JOHN and JANE DOES 1 through 100,

Defendants.

**NOTICE OF  
MOTION  
TO ADMIT  
COUNSEL  
PRO HAC VICE**

**Case No.  
11- CV- 6119**

PLEASE TAKE NOTICE that upon the annexed Admission Sponsor Affidavit of Christopher D. Thomas in support of this motion and the Petition of Michael N. Mulvania, we will move this Court before the Honorable Jonathan W. Feldman, at the United States Courthouse for the Western District of New York, pursuant to Rule 83.1(c) of the Local Rules of the United States District Court for the Western District of New York for an Order allowing the admission of Michael N. Mulvania, a member of the firm of Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C. and a member in good standing of the Bar of the District of Columbia and the State of Virginia, as attorney pro hac vice to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against Michael N. Mulvania in any State or Federal court.

Dated: Rochester, New York  
December 18, 2013

Respectfully submitted,

/s/ Christopher D. Thomas  
Christopher D. Thomas, Esq.  
Nixon Peabody LLP  
1300 Clinton Square  
Rochester, New York 14604  
[cdthomas@nixonpeabody.com](mailto:cdthomas@nixonpeabody.com)